

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 23-cr-20100
Hon. Matthew F. Leitman

v.

D-1 CALVIN ZASTROW,
D-2 CHESTER GALLAGHER,
D-3 HEATHER IDONI,
D-5 JOEL CURRY,
D-6 JUSTIN PHILLIPS,
D-7 D-7 EVA EDL, and
D-8 EVA ZASTROW,

Defendants.

/

**PROTECTIVE ORDER REGARDING
THE IDENTITIES OF THE GOVERNMENT’S WITNESSES**

Upon motion by the Government, the Court concludes that there exists good cause for a protective order entered pursuant to Federal Rule of Criminal Procedure 16(d)(1).

1. The Government’s Witness List. This order shall govern the defendants’ obligations with respect to the individuals included on the Government’s Witness List.
2. Confidentiality of the Government’s Witness List. The identities of individuals on the Government’s Witness List shall be treated as confidential during the pendency of this action. The Government’s Witness List shall be used by

defendants solely for the purposes of this criminal action. The defendants shall redact the last names of the individuals on the Government's Witness List if referred to in any pleadings filed in this litigation.

3. Disclosure of the Government's Witness List. The defendants shall not disclose the Government's Witness List or the names or other identifying information of the individuals listed to any person except as listed below:

- a. The Parties, counsel for the Parties, and their respective employees;
- b. Any person retained by counsel to assist in the preparation, trial, or appeal of this criminal action (or any collateral civil matter arising directly from this criminal action), including experts and investigators. With respect to such persons, (i) the identities of the individuals on the Government's Witness List shall be disclosed to the person only to the extent counsel determines in counsel's sole good faith professional judgment necessary to perform the work for which the person was retained; and (ii) the person shall not retain information revealing the identities of the individuals on the Government's Witness List after his or her work related to this criminal action has concluded;

- c. The Court and any persons employed by it working on this matter.

4. Inadvertent Disclosure. Nothing in this order exposes the defendants, the defendants' counsel, or the pro se defendants' standby counsel to contempt of court or any other type of sanction for unintentional or inadvertent disclosure of the

Government's Witness List or the identities of the individuals listed therein. In the event of such unintentional or inadvertent disclosure, defense counsel shall promptly notify the United States of the inadvertent disclosure, and the Parties' counsel shall discuss in good faith what steps, if any, should be taken to minimize the effect of such disclosure.

5. Objections to Order. Given the time constraints established by the Court's scheduling order, the Court entered this Order on an expedited basis – before receiving responses from Defendants who may wish to be heard on the Government's motion. The Court will entertain written objections to this Order from any Defendant who may wish to file such objections on the docket. The Court will review those objections de novo – as if they had been filed in a response to the Government's motion – and will conduct that review on an expedited basis.

IT IS SO ORDERED.

s/Matthew F. Leitman
MATTHEW F. LEITMAN
UNITED STATES DISTRICT JUDGE

Dated: April 5, 2024

I hereby certify that a copy of the foregoing document was served upon the parties and/or counsel of record on April 5, 2024, by electronic means and/or ordinary mail.

s/Holly A. Ryan
Case Manager
(313) 234-5126